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Fenix International Limited and Fenix Internet LLC
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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12 SOUTHERN DIVISION

13 N.Z., R.M., B.L., S.M., and A.L.,) CASE NO.: 8:24-cv-01655-FWS-SSC
14 individually and on behalf of)
themselves and all others similarly)
situated,)
15 Plaintiffs,)
16 v.)
17)
18 FENIX INTERNATIONAL)
19 LIMITED, FENIX INTERNET LLC,)
BOSS BADDIES LLC, MOXY)
20 MANAGEMENT, UNRULY)
AGENCY LLC (also d/b/a DYSRPT)
21 AGENCY), BEHAVE AGENCY)
LLC, A.S.H. AGENCY, CONTENT)
22 X, INC., VERGE AGENCY, INC.,)
AND ELITE CREATORS LLC,)
23 Defendants.)
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DEclaration of Raza Rasheed
in Support of Specially
Appearing Defendants Fenix
International Limited's and
Fenix Internet LLC's Motion
for Partial Reconsideration
or Alternatively
Certification of an
Interlocutory Appeal

Judge: Hon. Fred W. Slaughter
Courtroom: 10D
Date: August 28, 2025
Time: 10:00 a.m.

DECLARATION OF RAZA RASHEED

I, Raza Rasheed, declare and state as follows:

1. I am an attorney admitted to practice before the courts of the State of California and have been admitted to this Court. I am a counsel in the law firm of Skadden, Arps, Slate, Meagher & Flom LLP, which represents Specially Appearing Defendants Fenix International Limited and Fenix Internet LLC (together, “Fenix Defendants”). I submit this declaration in support of the Fenix Defendants’ Motion for Partial Reconsideration or Alternatively Certification of an Interlocutory Appeal (the “Motion”). This declaration is based on my own personal knowledge and if called upon to do so, I could and would testify competently thereto.

2. On July 23, 2025, I met and conferred via telephone with counsel for the Plaintiffs, Leonard Aragon, regarding the substance of the Motion and potential resolution. I explained Fenix Defendants’ position that the Court should either (1) partially reconsider its April 9 Order granting in part and denying in part Fenix Defendants’ Motion to Dismiss, or (2) certify the issue for interlocutory appeal. I explained Fenix Defendants’ position that partial reconsideration or interlocutory appeal is justified in light of the California Supreme Court’s July 21, 2025 decision in *EpicentRx, Inc. v. Superior Court*, --- P.3d ---, No. S282521, 2025 WL 2027272 (Cal.), which reversed, disapproved, or limited the California authorities upon which the Court’s Order relied. Plaintiffs indicated that their position would likely be to oppose any reconsideration or interlocutory appeal. The parties were unable to reach a resolution that eliminated the necessity of bringing the Motion.

3. Attached hereto as **Exhibit 1** is a true and correct copy of an article by Robert H. Klonoff titled “Why Most Nations Do Not Have U.S.-Style Class Actions” that was published in Bloomberg Law on May 22, 2015. A copy of this article was obtained at my direction by downloading it from Bloomberg Law, and the article is publicly available online at <https://news.bloomberglaw.com/class-action/why-most-nations-do-not-have-us-style-class-actions>.

1 I declare under penalty of perjury under the laws of the United States of America
2 that the foregoing is true and correct.

3 Executed on July 31, 2025, in Los Angeles, California.

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5 By: _____ */s/ Raza Rasheed*
6 Raza Rasheed

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